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September 22, 2017

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re:   *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket  
      No. 17-59**

Dear Ms. Dortch:

At the August 29, 2017 meeting, to discuss the above referenced docket,<sup>1</sup> AT&T agreed to provide additional information in response to questions that were raised in the meeting. In particular, AT&T agreed to provide information to Staff on the following: (a) the contractual language on which AT&T relies to enable blocking through its wholesale IP service; (b) the signal or message, if any, heard by the calling party when AT&T blocks a call on its IP network; (c) AT&T's process for responding to unblock requests; and (d) whether AT&T only blocks calls terminating to AT&T customers.

As discussed during our August 29 meeting, under the terms of its contracts for a wholesale IP-based call termination service,<sup>2</sup> AT&T may block calls that it reasonably believes are prohibited pursuant to language included in the AT&T Business Service Guide, which is part of the contract for such IP-based service. Specifically, the Service Guide provides that AT&T may "block any call, communication or transmission originating from, or terminating to, a telephone number, without notice of any kind to Customer, if AT&T reasonably believes that the call, communication or transmission constitutes Prohibited Traffic."<sup>3</sup> Prohibited Traffic, in turn, is defined to include "calls, communications, or transmissions being transmitted, placed, or attempted that AT&T reasonably believes are in violation of applicable laws, rules or regulations or are nuisance calls."<sup>4</sup>

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Notice of Proposed Rulemaking and Notice of Inquiry, 32 FCC Rcd 2306 (2017).

<sup>2</sup> The wholesale service is offered for U.S.-originated domestic outbound (1+) calls and U.S.-originated international outbound (011+) originated calls.

<sup>3</sup> General Provisions, GP-10.2, found at <http://serviceguidenew.att.com/>. Specifically cited as evidence of Prohibited Traffic are "[a]rtificial traffic stimulation, revenue pumping, regulatory arbitrage."

AT&T signals the wholesale customer when AT&T blocks a call to ensure that the wholesale customer is aware that the call did not connect. AT&T does not have any control of whether upstream providers pass on that signal until it reaches the calling party. AT&T may change (and has in the past changed) the blocked call signal it provides to wholesale customers. Indeed, AT&T currently is developing a custom blocked call signal that it intends to implement as part of its call blocking program. AT&T does not publicize the blocked call signal because doing so could enable bad actors to evade AT&T's efforts to block such calls.

Regarding unblock requests, AT&T seeks to establish and maintain bi-directional open lines of communication with its wholesale customers. Those lines of communication are available for requests to unblock a telephone number in the event a customer wants to make such a request. In the very limited instances in which AT&T has received an unblock request, AT&T first conducts an independent investigation to determine whether to sustain or remove the call block. As part of any such investigation, if necessary, AT&T may coordinate with the wholesale customer submitting the request and, as appropriate, seek the customer's assistance. In AT&T's experience, the process for troubleshooting and resolving a call completion issue takes anywhere from a few hours to a few days, although AT&T aims to conclude an investigation (and thus determine whether to remove or maintain a call block) within a 24-hour period.<sup>5</sup>

Finally, AT&T's call blocking program applies to all traffic transiting AT&T's IP network, which includes traffic destined to terminate to AT&T end-user customers and non-AT&T customers and end-user customers.

Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically for inclusion in the record of the above-referenced proceeding. If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Vonda Long-Dillard

Vonda Long-Dillard

cc: Mark Stone  
Micah Caldwell  
Karen Schroeder  
John B. Adams  
Richard Smith  
Kurt Schroeder  
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<sup>5</sup> See Comments of AT&T, CG Docket No. 17-59, at 11 n.30, 13 n.35 (filed July 31, 2017).